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AZ CORP COMMISSION
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January 14, 2003

Arizona Corporation Commission
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1200 West Washington Street, 3rd Floor
Phoenix, Arizona 85007

Arizona Corporation Commission
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Re: Docket No. S-3418A01-0000

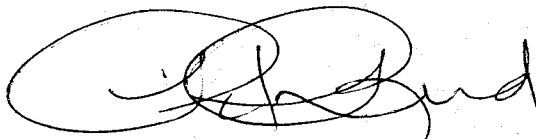
Dear Sir or Madam:

Enclosed please find sixteen copies of Respondent Ramey's Memorandum in Support of the Commission's approval of Order and Consent Decree for filing. Please return a date-stamped copy to this office in the enclosed, self-addressed stamped envelope.

Should you have any questions, please feel free to call.

Very truly yours,

CARDINAL & STACHEL, P.C.



Pat Reed, legal assistant to
Jana E. Flagler

Enclosures: as noted

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 2 Jana E. Flagler, Esq.
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 5 Sierra Vista, Arizona 85635
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 9 Ariz. St. Bar No. 018643
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11 **BEFORE THE ARIZONA CORPORATION COMMISSION**

12 **WILLIAM A. MUNDELL**
 13 **CHAIRMAN**
 14 **JIM IRVIN**
 15 **COMMISSIONER**
 16 **MARC SPITZER**
 17 **COMMISSIONER**

Docket No. S-03418A-01-0000

18 **IN THE MATTER OF:**

**RESPONDENT RAMEY'S
 MEMORANDUM IN SUPPORT
 OF THE COMMISSION'S
 APPROVAL OF ORDER AND
 CONSENT DECREE**

19 **RONALD LEE KEEL; DONALD**
 20 **RAMEY; and MERACANA MINING**
 21 **CORPORATION,**

22 **Respondents.**

23 **MEMORANDUM**

24 Respondent Donald Ramey, by and through counsel undersigned, hereby submits this
 25 Memorandum, respectfully requesting that the Commissioners of the Arizona Corporation
 26 Commission accept the proposed Order submitted in this matter by the Securities Division of the
 27 Arizona Corporation Commission.

28 The Securities Division has entered into an Order and Consent Decree with Mr. Donald
 Ramey. The arrangement attempts as its primary goal to achieve restitution for the investors of
 Meracana, while at the same time recognizing that Mr. Ramey, the single largest investor in
 Meracana, will, for all practical purposes, be the sole respondent capable of paying the
 restitution. The Order and Consent Decree permits Mr. Ramey to maintain his livelihood while
 making restitution to the other investors.

Mr. Ramey is 72 years old and operates a small business, Cochise Pest & Termite

1 Company in Sierra Vista, Arizona. Cochise Pest and Termite is Mr. Ramey's primary source of
2 income and security for his retirement. He has no other assets and except for social security, has
3 no other source of income. With this Consent Decree, Mr. Ramey is committing his life's work,
4 Cochise Pest & Termite, to paying back innocent investors in Meracana.

5 Mr. Ramey is the single largest monetary victim of the Meracana venture. The language
6 of the Consent Decree acknowledges Mr. Ramey's victimization and minor management role.
7 With the Consent Decree, Mr. Ramey accepts personal and financial responsibility for permitting
8 himself to be an ignorant figurehead. Though he believed he was part of a legitimate business,
9 Mr. Ramey's violations of the state's securities laws are directly related to Ronald Keel's
10 deflection of the truth combined with outright lies about Meracana.

11 Rather than reveal the true nature of Meracana and assist in restitution, Ronald Keel filed
12 bankruptcy approximately two years ago. Accordingly, Mr. Ramey as the only solvent
13 individual, bears the entire restitution burden. The restitution and penalties imposed upon him
14 compound his losses to the point of financial ruin.

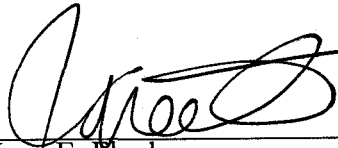
15 At his age, Mr. Ramey can only speculate as to how much longer he will be able to work
16 in his physically demanding business. He hopes to sell the Pest Control business while it is
17 financially viable. After 9/11, Mr. Ramey's business, like most, suffered. He was forced to take
18 out a second mortgage on his home and to run up credit card debt in order to stay in business.
19 Although he sees his business picking back up, it has been a slow climb. Mr. Ramey has paid
20 \$5,000.00 toward restitution already, and is able to pay \$1,500.00 per month thereafter until the
21 restitution, interest and \$7,500.00 penalty are paid in full. The restitution amount will accrue
22 interest at the rate of 10% per annum as indicated. Given such a high interest rate in today's
23 market, Mr. Ramey is highly motivated to pay off the restitution and fine as soon as possible and
24 hopes that the sale of his pest control business will enable him to accomplish that.

25 Mr. Ramey will be sacrificing nearly all revenue from his business to pay the restitution
26 burden. He puts in a hard and honest day, day after day, with his pest control company and has
27 grown it from the ground up. He now knows that he has lost well over two hundred thousand
28 dollars in Mr. Keel's gold mining venture. He has gained nothing from his investment except

1 more debts. Donald Ramey, is now paying for his trusting nature and is left with nothing for his
2 retirement.

3 RESPECTFULLY SUBMITTED this 14th day of January, 2003.

4 CARDINAL & STACHEL, P.C.

5
6 By: 
7 Jana E. Flagler
8 Attorney for Respondent Ramey

9 Copy of the foregoing
10 mailed this 14th day
11 of January, 2003, to:

12 Arizona Corporation Commission
13 Docket Control
14 1200 W. Washington
15 Phoenix, AZ 85007

16 Anthony B. Bingham
17 Special Assistant Attorney General
18 Securities Division
19 Arizona Corporation Commission
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